

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

V.

Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

4:23-cv-05448.

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

**STIPULATED REQUEST FOR AND
[PROPOSED] ORDER AUTHORIZING
META TO FILE AN AMENDED
ANSWER AND SETTING BRIEFING
SCHEDULE FOR STATE ATTORNEYS
GENERAL'S MOTION TO STRIKE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Under Civil Local Rules 6-2 and 7-12, the State Attorneys General (“State AGs”) and Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. On November 7, 2024, the Court approved the Parties' stipulation for an extension of time to confer regarding Meta's filing of an amended answer and the State AGs' potential motion to

1 strike certain affirmative defenses pleaded by Meta. Dkt. No. 1311. On November 20, 2024, the Court
2 further approved the Parties' agreement to submit by no later than December 13, 2024, proposed
3 deadlines for the filing of Meta's amended answer and the State AGs' motion to strike. Case No. 23-
4 05448, Dkt. No. 142.

5 2. The Parties have met and conferred and agreed to the following schedule:

- 6 • Meta will file its amended answer by January 15, 2025;
- 7 • The State AGs will file any motion to strike by February 3, 2025;
- 8 • Meta will file any opposition by February 28, 2025; and
- 9 • The State AGs will file any reply by March 7, 2025.

10 3. The Parties further agree to have any motion to strike heard at the March 21, 2025 Case
11 Management Conference, subject to the Court's availability.

12 4. The above schedule will provide each Party reasonable and appropriate time to prepare
13 any submissions to the Court.

14 5. The Parties submit that this proposal is consistent with the timeline of this MDL, which
15 departs from the conventional timeline of the Federal Rules of Civil Procedure due to the complexity of
16 issues involved in this case.

17 6. The Parties agree that the relief sought herein will not prejudice either Party.

18 7. The Parties agree that the relief sought herein will not affect the schedule of this case.

19 8. Accordingly, under Local Rules 6-2 and 7-12, the Parties stipulate and respectfully
20 request that the Court authorize Meta to file an amended answer on or before January 15, 2025, and
21 order the Parties' agreed-upon briefing schedule set forth above, with any motion to strike to be heard on
22 March 21, 2025, subject to the Court's availability.

23 **IT IS SO STIPULATED AND AGREED.**

24 ///

1 DATED: December 13, 2024

Respectfully submitted,

2 **ROB BONTA**
 3 Attorney General
 4 State of California

5 /s/ Bernard Eskandari
 6 Nicklas A. Akers (CA SBN 211222)
 7 Senior Assistant Attorney General
 8 Bernard Eskandari (SBN 244395)
 9 Emily Kalanithi (SBN 256972)
 10 Supervising Deputy Attorneys General
 11 Nayha Arora (CA SBN 350467)
 12 David Beglin (CA SBN 356401)
 13 Megan O'Neill (CA SBN 343535)
 14 Joshua Olszewski-Jubelirer (CA SBN 336428)
 15 Marissa Roy (CA SBN 318773)
 16 Brendan Ruddy (CA SBN 297896)
 17 Deputy Attorneys General
 18 California Department of Justice
 19 Office of the Attorney General
 20 455 Golden Gate Ave., Suite 11000
 21 San Francisco, CA 94102-7004
 22 Phone: (415) 510-4400
 23 Fax: (415) 703-5480
 24 Megan.O'Neill@doj.ca.gov

25 *Attorneys for Plaintiff the People of the State of*
 26 *California*

27 **PHILIP J. WEISER**
 28 Attorney General
 29 State of Colorado

30 /s/ Krista Batchelder
 31 Krista Batchelder, CO Reg. No. 45066, *pro hac vice*
 32 Senior Assistant Attorney General
 33 Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*
 34 First Assistant Attorney General
 35 Megan Paris Rundlet, CO Reg. No. 27474
 36 Senior Assistant Solicitor General
 37 Elizabeth Orem, CO Reg. No. 58309
 38 Assistant Attorney General
 39 Colorado Department of Law
 40 Ralph L. Carr Judicial Center
 41 Consumer Protection Section

1 1300 Broadway, 9th Floor
2 Denver, CO 80203
3 Phone: (720) 508-6348
4 krista.batchelder@coag.gov

5
6 *Attorneys for Plaintiff State of Colorado, ex rel. Philip J.*
7 *Weiser, Attorney General*

8
9 **RUSSELL COLEMAN**
10 Attorney General
11 Commonwealth of Kentucky

12 /s/ Philip Heleringer

13 J. Christian Lewis (KY Bar No. 87109), *Pro hac vice*
14 Philip Heleringer (KY Bar No. 96748), *Pro hac vice*
15 Zachary Richards (KY Bar No. 99209), *Pro hac vice*
16 Daniel I. Keiser (KY Bar No. 100264), *Pro hac vice*
17 Matthew Cocanougher (KY Bar No. 94292), *Pro hac vice*
18 Assistant Attorneys General
19 1024 Capital Center Drive, Suite 200
20 Frankfort, KY 40601
21 CHRISTIAN.LEWIS@KY.GOV
22 PHILIP.HELERINGER@KY.GOV
23 ZACH.RICHARDS@KY.GOV
24 DANIEL.KEISER@KY.GOV
25 MATTHEW.COCANOUGHER@KY.GOV
26 Phone: (502) 696-5300
27 Fax: (502) 564-2698

28 *Attorneys for Plaintiff the Commonwealth of Kentucky*

20 **MATTHEW J. PLATKIN**
21 Attorney General
22 State of New Jersey

23 /s/ Thomas Huynh

24 Kashif T. Chand (NJ Bar No. 016752008), *Pro hac vice*
25 Section Chief, Deputy Attorney General
26 Thomas Huynh (NJ Bar No. 200942017), *Pro hac vice*
27 Assistant Section Chief, Deputy Attorney General
28 Verna J. Pradaxay (NJ Bar No. 335822021), *Pro hac vice*
 Mandy K. Wang (NJ Bar No. 373452021), *Pro hac vice*
 Deputy Attorneys General
 New Jersey Office of the Attorney General,
 Division of Law

1 124 Halsey Street, 5th Floor
 2 Newark, NJ 07101
 3 Tel: (973) 648-2052
 4 Kashif.Chand@law.njoag.gov
 5 Thomas.Huynh@law.njoag.gov
 6 Verna.Pradaxay@law.njoag.gov
 7 Mandy.Wang@law.njoag.gov

8 *Attorneys for Plaintiff New Jersey Division of Consumer
 9 Affairs*

10 **COVINGTON & BURLING LLP**

11 /s/ Ashley Simonsen
 12 Ashley M. Simonsen, SBN 275203
 13 COVINGTON & BURLING LLP
 14 1999 Avenue of the Stars
 15 Los Angeles, CA 90067
 16 Telephone: (424) 332-4800
 17 Facsimile: + 1 (424) 332-4749
 18 Email: asimonsen@cov.com

19 Phyllis A. Jones, pro hac vice
 20 Paul W. Schmidt, pro hac vice
 21 COVINGTON & BURLING LLP
 22 One City Center
 23 850 Tenth Street, NW
 24 Washington, DC 20001-4956
 25 Telephone: + 1 (202) 662-6000
 26 Facsimile: + 1 (202) 662-6291
 27 Email: pajones@cov.com

28 *Attorney for Defendants Meta Platforms, Inc. f/k/a
 29 Facebook, Inc.; Facebook Holdings, LLC; Facebook
 30 Operations, LLC; Facebook Payments, Inc.; Facebook
 31 Technologies, LLC; Instagram, LLC; Siculus, Inc.; and
 32 Mark Elliot Zuckerberg*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: December 13, 2024

/s/ *Bernard Eskandari*

Bernard Eskandari

Attorney for the People of the State of California

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December ___, 2024

**YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE**